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**Organizations**

American Albacore Fishermen  
Association

Bandon Submarine Cable Council

Columbia River Crab Fisherman's  
Association

Fishing Vessel Owner Association

Grays Harbor Gillnetter's  
Association

Ilwaco Charter Association

Puget Sound Crab Association

Purse Seine Vessels Owners  
Association

Salmon for All

Washington Dungeness Crab  
Fishermen's Association

Washington Trollers Association

Western Fishboat Owners  
Association

Westport Charterboat Association

Willapa Bay Gillnetter's  
Association

Willapa-Grays Harbor Oyster  
Growers Association

**Supporting Members**

Bell Buoy Crab Company  
Englund Marine Supply  
Masco Petroleum  
Ocean Companies  
Port of Grays Harbor  
Port of Ilwaco  
WeFish  
West Coast Seafood  
Processors Association  
Westport Charters  
Westport Seafood

**Representative Jaime Herrera Beutler:**

23 June 2018

The Coalition of Coastal Fisheries (CCF) represents fourteen commercial seafood harvesting and charterboat organizations that fish in the Pacific Ocean and estuaries along the West Coast, as well as major fish processors, related supply companies, and ports. CCF membership ranges from smaller “mom and pop” operations to major seafood companies that employ thousands of workers in harvesting, processing, transporting, and distributing seafood across the country and throughout the world.

## CCF fully supports “Endangered Salmon and Fisheries Predation Prevention Act – HR 2083

Washington Salmon are a vital component of the CCF businesses. Salmon PREDATION is overwhelming the salmon’s ability to spawn and rear let alone provide good family wage JOBS for fish dependent communities. It is a well documented FACT that over abundant **Sea Lions are devastating salmon stocks** and threatening some endangered ESA species with probability of extinction causing extreme harm to fish dependent communities in the process. **The Marine Mammal Protection Act needs considerable modification.** CCF fully supports the efforts in both the House and Senate to offer much needed relief for salmon that are literally being eaten out of existence by large numbers of over protected Sea Lions in the Columbia River and elsewhere. Sea Lion populations have exploded in recent years and are no longer in need of excessive and total protection. The ramifications of MMA over protection of Sea Lions is adversely affecting other laws (ESA/MSA) and our citizens ability to fish and earn a living from salmon. The MMA is creating a difficult situation under the Magnuson Stevens FCMA in that some salmon are termed “overfished” when nothing could be further from the truth; salmon are being subjected to excessive over PREDATION that continues to cut drastically into all salmon fishing. The only accomplishment of that “overfished” terminology in the MSA is to place added “no fishing” pressure on commercial fishing that is totally unwarranted.

Laws have consequences sometime unintended. The MMA with no top end to the protections afforded Sea Lions is causing tremendous adverse consequences to salmon and salmon dependent communities. The “Endangered Salmon Predation Prevention Act” will definitely help control adverse unintended consequences that Sea Lions have on salmon. CCF fully supports this effort to protect salmon in the Columbia & tributaries and pray the salmon protection bill becomes law.

The ‘Endangered Salmon and Fisheries Predation Prevention Act’ leads CCF to also offer the following comments for your consideration as the house drafts its bill, HR 200 to reauthorize the Magnuson-Stevens Fishery Conservation and Management Act (MSA) in 2018.



First and foremost, **providing more flexibility** should be the top goal of any changes to the requirements set forth in the MSA. The addition of provisions to increase flexibility with respect to stock rebuilding would improve the ability of Fishery Management Councils to achieve management objectives. Flexibility is absolutely necessary for the Councils to address the unique and often-changing circumstances that arise between fish stocks, fishing sectors, fishing communities, and regional ecosystems. The original congressional intent of the MSA was two fold the sustainable conservation of ocean natural resources and for those resources to provide sustainable family wage JOBS for our citizens; people are not being properly considered today.

In general, CCF supports many of the reform provisions contained in H.R. 200, the *Strengthening Fishing Communities and Increasing Flexibility in Fisheries Management Act*, recently advanced in the House. We hope the Senate will consider some of these provisions as well, especially the ones discussed below.

Increasing flexibility to enhance fisheries management can be most effectively accomplished in the MSA reauthorization by **eliminating the arbitrary 10-year time requirement for rebuilding fisheries**, replacing it with a biologically-based foundation, and relying on our regional fisheries management process (i.e., the Councils) to determine the optimal path to stock rebuilding that also encapsulates the **needs of fish dependent communities**. The 10-year rebuilding requirement has long been considered to be arbitrary but was touted by the environmental community as the gold standard. However, the national academy of science concluded in their 2013 report titled “Evaluating the Effectiveness of Fish Stock Rebuilding Plans in the U.S.” that ten years is indeed arbitrary given the vast differences in habitat, life history, and environmental conditions for fish stocks around the nation. It is therefore time to replace this highly restrictive anti-fishing requirement with more scientifically-valid metrics that also fully considers fish dependent communities as well as conservation of the species.

Similarly, CCF supports **adding language in the Act to:** allow rebuilding plans to take into account environmental factors and predator/prey relationships; require a schedule for reviewing rebuilding targets and progress being made towards those targets; and allow consideration of alternative rebuilding strategies including harvest control rules and fishing mortality rate targets. These provisions are also consistent with the best available science.

We strongly support **changing language in Section 304 of the Act from “possible” to “practicable”** in terms of rebuilding periods. The intent of this change is not to compromise or weaken the effectiveness of the MSA, but rather to help better fulfill one of the fundamental and original goals of the Act, emphasized in **National Standard 1 – to prevent overfishing while achieving, on a continuing basis the optimum yield from each fishery** to support communities.

*Case in Point:* The Pacific Fishery Management Council faced a difficult situation in 2013 with rebuilding plans for two rockfish stocks. At that time, allowing 30-mt increase in the ACL of a single rockfish species while achieving rebuilt status in December of that year (vs. January of that same year) would have provided for another few hundred tons of associated rockfish landings. While the dockside landed value of those fish may not have been viewed as significant, the indirect value was enormous: having more incidental species available would have provided additional opportunity for commercial, sport, and tribal harvesters to access abundant stocks of fish that currently go **unharvested due to the choke species effect**. In turn, local vessels would have had another few weeks on the water, processors would have had longer seasons, consumers would

have had healthier domestic seafood – all without any risk to the status of the rebuilding rockfish species. Yet, the interpretation of the law required selection of a rebuilding time that would be as short as possible, not as short as practicable; **fish dependent communities SUFFER unnecessarily.**

Simply changing the terminology from “possible” to “practicable” in the rebuilding requirements of the MSA would provide councils much needed flexibility and the option to choose between several rebuilding scenarios to achieve specified conservation and management objectives, not just the shortest and most harmful to fishing communities. With this change, the Councils would be able to exercise some reasonable judgment so they could, for example, allow a fish stock to be rebuilt in December rather than January, which were the choices available for canary rockfish in the above example.

CCF supports **modifying requirements for annual catch limits (ACLs)** to allow regional Fishery Management Councils to consider ecosystem changes and the **needs of fishing communities when establishing catch limits.** In light of changing environmental conditions, and the role of the environment in fisheries recruitment, these considerations certainly make scientific and common sense.

We also support **adding language to allow ACLs for multispecies stocks/complexes to be set for multiple years.** We believe flexibility should be provided to establish multiyear periods in which an overall catch limit could be set, but annual harvest could fluctuate based on fishing conditions, market conditions, weather, water temperature, or any of the other variables that affect fisheries harvest. If the best available science and the management/monitoring systems can support this approach, we see no reason to specify that harvest levels must be set each and every year. This adds unnecessary expense to fisheries management and does little to protect stocks or fish dependent communities.

We support **redefining overfishing and change the term overfished to depleted** throughout the Act. This is a simple yet very important change that more accurately characterizes stock condition, which is most often based on several factors, not solely on fishing mortality. The term overfished is perceived negatively and can unfairly implicate the industry for stock conditions resulting from other factors like pollution, coastal development, and changing ocean conditions and excessive PREDATION especially related to salmon stocks that are suffering from not only EXCESSIVE Sea Lion devastation on salmon but other highly consequential avian predation that is excessively restricting fishing. **“Overfishing” is a term NGO’s use to vilify fishing** when the circumstances are often totally unwarranted and nothing to do with fishing.

We look forward to working with congress to support the passage of fair, balanced legislation offering salmon the protection they so desperately need from excessive Sea Lion PREDATION that will fulfill the full intent of the Magnuson-Stevens Act to not only conserve our fisheries resources but also provide good family wage JOBS in our coastal fish dependent communities.

**It is fully time to relieve the fishing industry of the erroneous term “overfishing” when it is clearly excessive “PREDATION” leading to depleted salmon stocks.**

**Thank you for your continued support, much appreciated,**



Dale Beasley, President Coalition of Coastal Fisheries and Columbia River Crab Fisherman’s Association